

INEC

c/o Isabelle Auger – Legal Adviser
20, rue Brunel
F-75017 Paris

Tel.: +33 1 56 60 47 41

Fax: +33 1 56 60 47 04

e-mail: isabelle.auger@danisco.com

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Arthur Neal, Director, Program Administration
National Organic Program
USDA–AMS—TMP–NOP
1400 Independence Ave. SW
Room 4008 So., Ag Stop 0268
Washington, DC 20250

Via E-mail: National.List@usda.gov

Re : 7 CFR part 205.606 (b) : Locust bean gum

The Association of Producers of Carob Bean Gum (INEC), a non governmental organization, welcomes the opportunity to comment on the Sunset Review of the 2002 National List and is asking for the continued listing of Locust Bean Gum (Carob Bean Gum) on the National List under §205.606 Nonorganically produced agricultural products allowed as ingredients in or on processed products labeled as “organic” or “made with organic (specified ingredient or food group). (b) Gums :

The Locust bean gum is a natural product in its native state obtained by grinding the endosperm of the seeds from Carob trees (*Ceratonia siliqua* (L.) Taub. (Fam. *Leguminosae*)). INEC asks that the Locust bean gum (Carob bean gum) remains on the National List as it is

- (1) Not harmful to human health or the environment.
- (2) Necessary because of the unavailability of alternatives
- (3) Consistent and compatible with organic practices.

Toxicological data relating to Locust bean gum have been reviewed by the WHO Joint Expert Committee for Food Additives (JECFA). It has been recognized as safe and has been assigned an Acceptable Daily Intake (ADI) of “not specified”, the highest possible ADI for food ingredients with no adverse effects. It is permitted for use in foods by the FDA (21 CFR 182.1343)

Information regarding relevance and compatibility with the evaluation criteria of the OFPA are as follows:

Category 1: No adverse impacts on humans or the environment.

The manufacturing process of Locust bean gum is a milling process having no adverse effects on the environment.

Locust bean gum has no impact on the environment. It is high molecular weight polysaccharide (galactomannane) that degrades in the environment.

Locust bean gum does not contain any inert as mentioned in lists 1, 2 or 3

There is no detrimental or adverse effect due to interactions with materials used, in agro-eco-systems or on soil organisms, crops or livestock.

Locust bean gum is biodegradable and therefore is not persistent in the environment

Category 2: Substances are essential to organic production.

The Locust bean gum is a natural substance of vegetal origin, produced by a physical process (milling) and does not undergo any chemical modification. As of today, there is hardly any Locust bean gum available as “organic”.

The locust bean gum is used as a thickener and stabilizer in a number of foods requiring specific texture such as ice-creams, sherbets, water-ices, cream cheeses, yogurts, pie fillings, fruit preparations, sauces and dressings. Its main properties are to provide viscosity, specific mouth feel and texture, stability to freeze-thaw and unique gelling properties in association with other thickeners. Typical dosages are low, typically less than 0.5%. The use of locust bean gum allows providing the customer with a greater choice of products labeled as “organic”.

Category 3: Substances are compatible with organic production practices

Locust bean gum is currently listed under § 205.606 (b).

Yours sincerely

Isabelle Auger
INEC Legal Adviser